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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Jermaine Devon Howard

Write the full name of each plaintiff.

CV

(Include case number if one has been assigned)

-against-

Sean "P-Diddy, Puff" Combs, Bad Boy
Records, Bad Boy Entertainment, Arista
Records

COMPLAINT

Do you want a jury trial?

☒ Yes ☐ No

Write the full name of each defendant. If you need more space, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed above must be identical to those contained in Section II.

NOTICE

The public can access electronic court files. For privacy and security reasons, papers filed with the court should therefore *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number. See Federal Rule of Civil Procedure 5.2.

I. BASIS FOR JURISDICTION

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation, and the amount in controversy is more than \$75,000, is a diversity case. In a diversity case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal-court jurisdiction in your case?

☐ Federal Question

☒ Diversity of Citizenship

A. If you checked Federal Question

Which of your federal constitutional or federal statutory rights have been violated?

B. If you checked Diversity of Citizenship**1. Citizenship of the parties**

Of what State is each party a citizen?

The plaintiff, Jermaine Howard, is a citizen of the State of
(Plaintiff's name)

New York
(State in which the person resides and intends to remain.)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of

If more than one plaintiff is named in the complaint, attach additional pages providing information for each additional plaintiff.

If the defendant is an individual:

The defendant, Sean Combs, is a citizen of the State of
(Defendant's name)

California

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of _____.

If the defendant is a corporation:

The defendant, _____, is incorporated under the laws of
the State of _____

and has its principal place of business in the State of _____

or is incorporated under the laws of (foreign state) _____

and has its principal place of business in _____.

If more than one defendant is named in the complaint, attach additional pages providing information for each additional defendant.

II. PARTIES

A. Plaintiff Information

Provide the following information for each plaintiff named in the complaint. Attach additional pages if needed.

<u>Jermaine</u>	<u>J</u>	<u>Howard</u>
First Name	Middle Initial	Last Name
<u>1035 Beach Rd #D2</u>		
Street Address		
<u>Erie, Buffalo</u>	<u>NY</u>	<u>14225</u>
County, City	State	Zip Code
<u>(716) 436-9009</u>	<u>jhoward4@buffalo.edu</u>	
Telephone Number	Email Address (if available)	

B. Defendant Information

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. Attach additional pages if needed.

Defendant 1: Sean Combs
 First Name Last Name
Music Executive (Bad Boy Records, Entertainment)
 Current Job Title (or other identifying information)
200 S. Mapleton Dr
 Current Work Address (or other address where defendant may be served)
LA, Los Angeles Ca. 90077
 County, City State Zip Code

Defendant 2: Arista Records
 First Name Last Name
Business
 Current Job Title (or other identifying information)
Aristarecordings.com
 Current Work Address (or other address where defendant may be served)
Santa Clara Ca. 98105
 County, City State Zip Code

Defendant 3: _____
 First Name Last Name

 Current Job Title (or other identifying information)

 Current Work Address (or other address where defendant may be served)

 County, City State Zip Code

Defendant 4:

First Name

Last Name

Current Job Title (or other identifying information)

Current Work Address (or other address where defendant may be served)

County, City

State

Zip Code

III. STATEMENT OF CLAIMPlace(s) of occurrence: Buffalo, NYDate(s) of occurrence: 9/93 - 8/98**FACTS:**

State here briefly the FACTS that support your case. Describe what happened, how you were harmed, and what each defendant personally did or failed to do that harmed you. Attach additional pages if needed.

I was performing open mic shows at a Venu named the Imporia located in Buffalo, NY on Elmwood Ave near W. Utica St. I was asked to the back where it was a studio and was approached about writing a song for one of his artists by "Puff". Puff said he wanted me to write a song to an 80's groove. I said, I would try. I began writing and performing a song Puff named, "Juicy". which Notorius B.I.G. performed/recorded and exploited. ~~and~~ I was never compensated for my copyright ownership which "Puff" stated, I had through recordings and U.S. Copyright Office Registration. This was in 9/1993. At this time, I was attacked in the studio after signing contracts and documents for copyrights by

"Puffy" and other gentleman. At one instance, my ^{face} plate was in a plate of Cocaine about 4 ounces and "Puffy" was saying "Breathe Bitch". "Puffy" in 1994, apologized to my mom at my residence and asked me to do more music with him. I wrote two songs, "You Use to Love Me" and "Come Over" Faith Evans an artist of "Puffy's" exploited these copyrights. I am owed at least account and Divide for these three Copyright Violations by way of neglect INJURIES:

If you were injured as a result of these actions, describe your injuries and what medical treatment, if any, you required and received.

I did go to the hospital ECMC for the incident when I was violently attacked because "Puffy" and his body-guard Wolfe Slammed my head into an industrial oven, 9/1993.

IV. RELIEF

State briefly what money damages or other relief you want the court to order.

I am owed because I have joint copyright ownership for authoring songs, "Juicy", "You Use to Love Me" and "Come Over", and any other damages the Court sees fit.

V. PLAINTIFF'S CERTIFICATION AND WARNINGS

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11.

I agree to notify the Clerk's Office in writing of any changes to my mailing address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an IFP application.

6/10/2024
 Dated

Jermaine Howard
 Plaintiff's Signature

Jermaine Jevon Howard
 First Name Middle Initial Last Name

1035 Beach Rd #D2
 Street Address

Erie, Buffalo NY 14225
 County, City State Zip Code

(716) 436-9009 jhoward4@buffalo.edu
 Telephone Number Email Address (if available)

I have read the Pro Se (Nonprisoner) Consent to Receive Documents Electronically:

☒ Yes ☐ No

If you do consent to receive documents electronically, submit the completed form with your complaint. If you do not consent, please do not attach the form.